

FILED

February 28, 2024

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
By: DT
Deputy Clerk

UNITED STATES OF AMERICA,**Plaintiff,**

v.

(1) RAUL MANUEL CHAVEZ,**Defendant.**

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Case No: EP:24-CR-00490-KC(1)

**UNITED STATES' MOTION TO DETAIN DEFENDANTS WITHOUT
BOND AND MOTION FOR CONTINUANCE**

Comes now the United States of America, by and through the United States Attorney for the Western District of Texas, and pursuant to 18 U.S.C. § 3142(e) and (f), files this, its Motion to Detain Defendant Without Bond and Motion for Continuance, and for cause, would respectfully show unto the Court the following:

1. The Defendant was arrested for a violation of Title 18, United States Code, Sections 933(a)(1), (a)(3), and (b) – *Trafficking in Firearms*, and 922(g)(1) and 924(a)(2), *Felon in Possession of a Firearm*.

2. The Defendant has a prior criminal history.

3. There are no conditions or combination of conditions which will reasonably assure the safety of the community should the Defendant be released on bond.

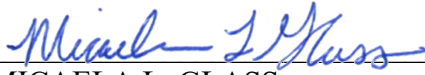
4. There are no conditions or combination of conditions which will reasonably assure the appearance of the Defendant at future court settings.

The Government would further move the Court for a three-day continuance of the detention hearing from the date of the initial appearance.

WHEREFORE, premises considered, the Government respectfully prays the Court to hold the above-named Defendant without bail pending the final outcome of this case.

Respectfully submitted,

JAIME ESPARZA
UNITED STATES ATTORNEY

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